

Ramon Rossi Lopez
rlopez@lopezmchugh.com
(California Bar Number 86361; admitted *pro hac vice*)
Lopez McHugh LLP
100 Bayview Circle, Suite 5600
Newport Beach, California 92660
949-812-5771

Mark S. O'Connor (011029)
moconnor@beusgilbert.com
Beus Gilbert, PLLC
701 N. 44th Street
Phoenix, Arizona 85008
602-429-3019

Co-Lead/Liaison Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

In Re Bard IVC Filters Products Liability Litigation

No. MD-15-02641-PHX-DGC

**NOTICE OF LODGING PROPOSED
CHANGES TO *HYDE* JUROR
QUESTIONNAIRE FOR *TINLIN V.
BARD***

(Assigned to the Honorable David G. Campbell)

(Tinlin Bellwether Case)

Pursuant to Case Management Order 39 (Doc. 12971), the parties submit their proposed modifications to the *Hyde* juror questionnaire for the *Tinlin v. Bard* bellwether trial. The proposed changes are shown in Track Changes version of the Court's questionnaire in *Hyde*, attached hereto as Exhibit A. The parties agree on all proposed changes.

1 RESPECTFULLY SUBMITTED this 1st day of March, 2019.

2 BEUS GILBERT, PLLC

3 By: /s/ Mark O'Connor

4
5 Mark S. O'Connor
6 701 N. 44th Street
7 Phoenix, Arizona 85008

8 LOPEZ McHUGH LLP
9 Ramon Rossi Lopez (CA Bar No.
10 86361)
11 (admitted *pro hac vice*)
12 100 Bayview Circle, Suite 5600
13 Newport Beach, California 92660

14 *Co-Lead/Liaison Counsel for Plaintiffs*

NELSON MULLINS RILEY &
SCARBOROUGH, LLP

By: /s/ Richard B. North (with permission)

Richard B. North Jr.
Georgia Bar No. 545599
Matthew B. Lerner
Georgia Bar No. 446986
201 17th Street, NW, Ste. 1700
Atlanta, GA 30363

James R. Condo (005867)
Amanda Sheridan (027360)
SNELL & WILMER L.L.P.
One Arizona Center
400 E. Van Buren
Phoenix, AZ 85004-2204

15
16 *Attorneys for Defendants C.R. Bard, Inc.*
17 *and Bard Peripheral Vascular, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of March 2019, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

20 /s/Jessica Gallentine